## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,	)
Plaintiff,	) ) Cause No. 4:22-CR-00297 SRC/JMB
<b>v.</b>	)
JOHN COLLINS-MUHAMMAD,	)
Defendant.	)

## **DEFENDANT'S WAIVER OF PRETRIAL MOTIONS**

Comes now Defendant John Collins-Muhammad, by counsel, and pursuant to the Court's pretrial order hereby notifies the Court of the following:

- 1. Defendant and Government have entered into a plea agreement. As a condition of the plea agreement, Defendant waives pretrial motions.
- 2. There are no further issues that the Defendant wishes to raise by way of pretrial motion.
  - 3. Counsel has personally discussed this matter with the Defendant.
- 4. The Defendant agrees and concurs in the decision not to raise any issues by way of pretrial motions.
- 5. Therefore, Defendant respectfully requests the Court accept Defendant's waiver of motions.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD, ATTORNEYS AT LAW, P.C.

By /s/ Joseph W. Flees

JOSEPH W. FLEES (#60872MO) Counsel for Defendant 7710 Carondelet Avenue, Suite 350 Clayton, Missouri 63105 (314) 725-7777 iflees@fjrdefense.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 22, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Hal Goldsmith Asst. United States Attorney 111 South Tenth Street, 20<sup>th</sup> Floor St. Louis, Missouri, 63102

> /s/ Joseph W. Flees JOSEPH W. FLEES